Clean Air Act 112(r) Risk Management Program (RMP) SPCC/FRP EPCRA

CHEMICAL EMERGENCY PREVENTION & PLANNING Newsletter

July - August 2009 US EPA Region 10

Inside This Issue

CHEMICAL EMERGENCY PREVENTION & PLANNING
Newsletter

US EPA Region 10,
ERU ECL-116
1200 6th Avenue, Suite 900
Seattle, Washington 98101

206.553.1255
Fax: 206.553.0124

http://www.epa.gov/r10earth/112r.htm

Newsletter Contacts:
*For **RMP**:* Javier Morales at morales.javier@epa.gov

*For **SPCC/FRP**: AK: Matt Carr at* carr.matthew@epa.gov

WA OR ID: Michael Sibley at sibley.michael@epa.gov

*For **EPCRA**:* Suzanne Powers at powers.suzanne@epa.gov

*For free **Subscription**:* allen.stephanie@epa.gov

REPORT
CHEMICAL or OIL SPILLS
to the NATIONAL RESPONSE CENTER
1-800-424-8802

24 Hour Emergency Contact and Emergency Response

All facilities that are required to maintain a Risk Management Plan must work with their Local Emergency Planning Committees and other local responders to ensure that they are prepared to respond to an emergency. If your facility uses an alarm company to contact the local responders for an emergency, what role do they play as a 24-hour emergency contact? **How would your facility emergency contact perform?**

Consider the following situation.

A chlorine leak occurred in February 2007 at a bleach production facility in Tacoma Washington. As a result of this incident, a portion of the Port of Tacoma had to be closed, 26 people had to be transported to area hospitals for evaluation and treatment. The incident also required evacuation of a number of people in the effected area.

Typically, only three employees worked the evening shift at the bleach plant. This involved one operator working alone in the cylinder charging area filling 7-foot-long pressurized one-ton containers with chlorine. At 6:40 p.m. the operator made an error on the fill line that caused a release of chlorine gas. To correct his mistake he held his breath, picked up a wrench and tried to shut a valve. When he realized he couldn't fix the problem, he immediately left the gas house. The operator alerted the two other men working at the bleach plant that night, and they also left the plant.

The chlorine release triggered an automatic alarm. The alarm system shut the gas house doors and alerted

continued on page 2

continued from page1

24 Hour Emergency Contact and Emergency Response

the facility's private alarm company. At 6:48 p.m., the 911 dispatcher answered the call from the alarm company. The following partial transcript of the 911 call highlights a **serious flaw in the alarm system notification process at the facility. – Insufficient Information.**

Fire Department 911 dispatcher: *"What kind of alarm is it?"*
Alarm company: *"It's a fire."*
911 dispatcher: *"What type of detection?"*
Alarm company: *"Chlorine."*
911 dispatcher: *"Chlorine? Wait a minute, it's a fire alarm?"*
Alarm company: *"Yes."*
911 dispatcher: *"OK, is it a smoke detector or a heat detector? What's a chlorine detector?"*
Alarm company: *"Umm … it, it (stutters) just says chlorine detector."*
911 dispatcher: *"I need to know what that is. You need to find out what that is for me, OK?"*

The alarm company watch officer did not know the difference between a chlorine alarm and a fire alarm. Fortunately, Fire Department records showed that this facility stored 720,000 pounds of chlorine. The confusion over the type of alarm could have caused a delay in notifying the responders of the need for a hazmat team.

Additionally, the Plant Manager was not allowed back in the facility to get their notification list in his office, which caused him to do late reporting, resulting in a EPCRA fine.

Your Responsibility

Requirements vary according to Program Level and responder status but all facilities must:

- Establish appropriate mechanism to notify emergency responders in an emergency.
- Identify an emergency contact that the responder will call for a toxic or flammable release.

Lessons Learned

Insure your emergency contact receives training and has all the necessary information needed in case of an incident.

- Knows what each alarm indicates.
- Presence of toxics and/or flammables.
- Can communicate this information to the appropriate emergency response organization; e.g., "911."
- Facility staff should carry a notification list with them. Remember that during an emergency, office records may not be accessible.

What Can Go Wrong

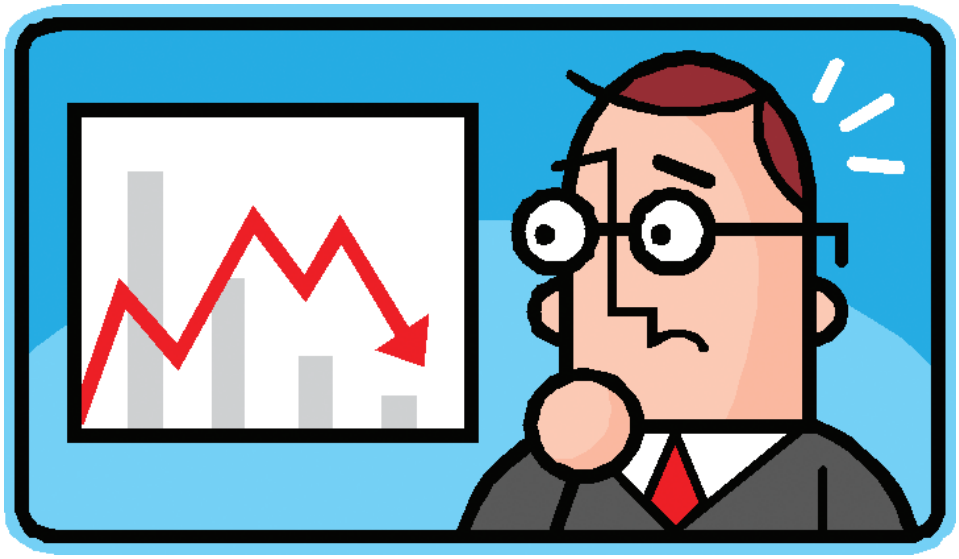
Evaluate your emergency response program before a chemical release occurs.

For more information on the RMP regulations and guidance on Emergency Response:

http://www.epa.gov/emergencies/docs/chem/Chap-08-final.pdf

Don't Forget Safety in a Difficult Economy!

Economic times are difficult in nearly every country. Sales and profits are down and many companies are losing money. Plants are operating at reduced rate, and some are being shut down. As profits fall, there is increased pressure to reduce operating cost, including reduction in staff. More frequent shutdowns and startups, or operation at reduced rates, may impact safe operations and stress people. The increased stress on workers can cause inattention to detail and mistakes. Despite these pressures, both management and workers must remain focused on safety, and process safety. Ensure that training and preventive maintenance, both essential to safety and long term economic success, are not compromised. Decisions to reduce staffing need to be carefully considered using your facility's management of change process, and you must ensure that safety critical activities are not compromised by staff reductions.



Don't let short term economic pain cause long term safety damage!

What can you do?

- Maintain continued emphasis on safety values and standards in a difficult economy. We must maintain our focus on process safety under all circumstances.
- Understand what activities are safety-critical in your facility, and make sure these activities are not compromised by economic pressures.
- Suggest opportunities to perform important safety related maintenance and modifications and improvements during periods of reduced demand. The recession may present a good opportunity to conduct these activities. Market demand is low and the plant may be shut down or running at reduced rate anyway.
- If you are aware of critical safety equipment or safety activities which are being adversely impacted by cost saving measures, make sure that your management is aware of the issues. Decisions may have been made on cost without fully understanding the potential safety impact.
- Use management of change reviews to fully understand the impact of all changes, including staffing changes, reduced operating rate, changes in operating schedule, and other cost cutting plant modifications.

(Reprinted from CCPS Beacon)

To register for a FREE monthly issue of the ***CCPS Beacon***, go to: **http://www.aiche.org/apps/ccps/safetybeaconfrm.asp**

Where Do I Go For More Information?

http://www.epa.gov/emergencies/rmp will be updated as new information becomes available.

EPA maintains numerous listservs to keep the public, state and local officials, and industry up to date, including several that pertain to emergency management. You can sign up for our list serve to receive periodic updates: **https://lists.epa.gov/read/all_forums/subscribe?name=callcenter_oswer**

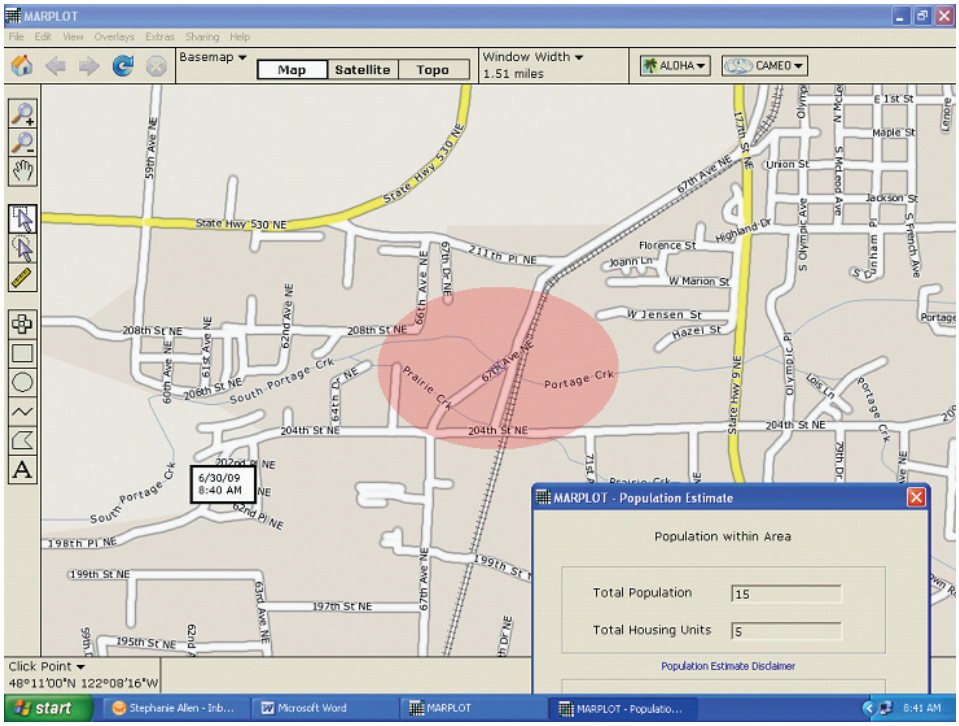
EPA Region 10 RMP Coordinator:
Javier Morales 206-553-1255

EPA Region 10 RMP Website:
http://yosemite.epa.gov/R10/CLEANUP.NSF/sites/rmp

RMP Facilities:

New MARPLOT Mapping Program Released

A new version of the MARPLOT mapping program is now available. The updated program is part of the CAMEO software suite, created for hazmat responders and planners by OR&R in collaboration with EPA. The program is available at no cost.



MARPLOT may be used to fulfill the requirements of 40 CFR Part 68.30 "Defining offsite impacts—population." The application can:

- Estimate (in the RMP) the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).

  The population shall include residential population. The presence of institutions (schools, hospitals, prisons), parks and recreational areas, and major commercial, office, and industrial buildings shall be noted in the RMP. [68.22(b)]
- You can create and document maps of the worst case/alternative release scenarios. In addition, you can document the population estimates within the threat zones. [68.39(e)].

Working in MARPLOT's easy-to-use GIS interface, you can switch between three base maps: standard map files, high-resolution aerial photos, and topographical maps. You can get population estimates inside selected areas and can customize maps using drawing tools and an extensive symbol set.

MARPLOT 4.0.1 incorporates web-mapping services and supports the use of shapefiles and a variety of raster formats. You'll be able to click on a location of interest to get its elevation and an instant weather forecast, and you can work with Landview-like population functions. As you work with the new version, the latest U.S. Census county maps, and state and national map layers will automatically download.

For full details and to download the application (for free) go to MARPLOT web-page:
http://response.restoration.noaa.gov/marplot

RMP* eSubmit Update

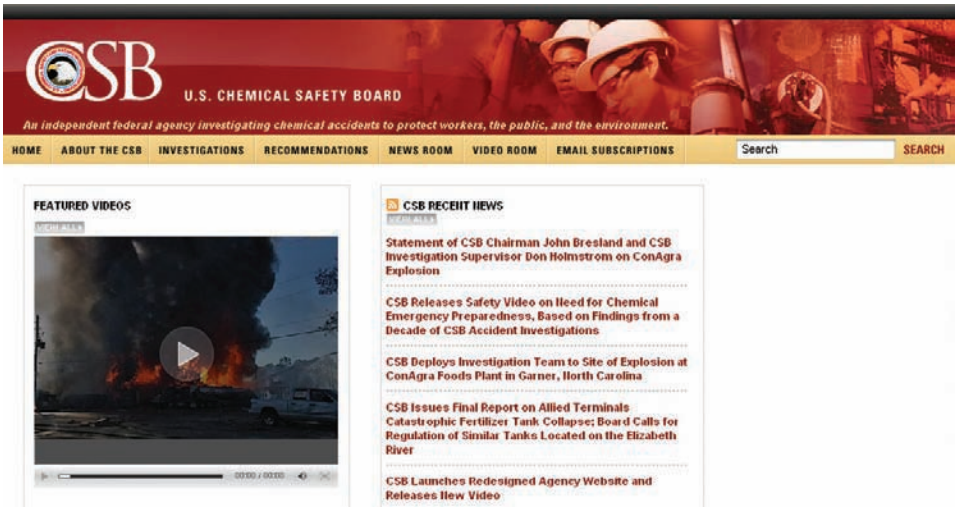
U.S. EPA Risk Management Program Reporting Center is processing more that 600 ESAs (Electronic Signature Agreements) per week. There are over 6,000 RMP facilities due for 5-year resubmission in June. As of June 16, 2009, RMP RC has received 7,280 ESAs from RMP facilities and 2,678 RMP*eSubmit submissions have been processed. There are about 1,000 submissions in the process flow.

Make sure your submission gets processed properly, without delay:

- Send all parts of the ESA, not just the last page.
- Send to RMP Reporting Center, not to Region 10.
- Do not confuse the Toxics Release Inventory (TRI) Reports due July 1st with your 5-year update due date.

Training Suggestions:

Two Recent Releases by the Chemical Safety Board Offer Good Information for Process Safety Programs.



CSB Releases Safety Video on Need for Chemical Emergency Preparedness, Based on Findings from a Decade of CSB Accident Investigations

Washington, DC, June 11, 2009 – The U.S. Chemical Safety Board (CSB) released a **new safety video** showing the need for emergency response agencies, companies, and communities to work closely together to prepare for the kinds of tragic chemical accidents the CSB has investigated over the past decade.

These and other resources are available at:
http://www.chemsafety.gov

CSB Issues Final Report on Allied Terminals Catastrophic Fertilizer Tank Collapse; Board Calls for Regulation of Similar Tanks

On November 12, 2008, an aboveground storage tank catastrophically failed releasing two million gallons of liquid urea ammonium nitrate (UAN) fertilizer and seriously injuring two workers. The release overtopped a containment dike and flooded sections of a nearby residential neighborhood, requiring remediation of the soil. At least 200,000 gallons of spilled fertilizer could not be accounted for, and some reached the nearby Elizabeth River, which flows into the Chesapeake Bay.

For More Information

Superfund, TRI, EPCRA, RMP & Oil Information Center - The Information Center can also answer questions related to Clean Air Act section 112(r) and RMP reporting requirements.

(800) 424-9346 or TDD (800) 553-7672
(703) 412-9810 or TDD (703) 412-3323
in the Washington, D.C. area
Normal Hours of Operation:
Monday - Thursday 10:00 a.m. - 3:00 p.m. Eastern Time
Extended Hours of Operation (May, June, and July):
Monday - Friday 9:00 a.m. - 5:00 p.m. Eastern Time
Closed Federal Holidays

http://www.epa.gov/superfund/contacts/infocenter/

Risk Management Program (RMP) Reporting Center - The Reporting Center can answer questions about software or installation problems. The RMP Reporting Center is available from 8:00 a.m. to 4:30 p.m., Monday through Friday, for questions on the Risk Management Plan program.
(301) 429-5018 (phone)
userrmp.usersupport@csc.com (e-mail)

This newsletter provides information on the EPA Risk Management Program, EPCRA, SPCC/FRP and other issues relating to Accidental Release Prevention Requirements. The information should be used as a reference tool, not as a definitive source of compliance information. Compliance regulations are published in 40 CFR Part 68 for CAA section 112(r) Risk Management Program, and 40 CFR Part 355/370 for EPCRA.

SPCC Update

SPCC Compliance Dates Extended

WASHINGTON - The U.S. Environmental Protection Agency (EPA) has extended the compliance date for all facilities and established a new compliance date for farms subject to the oil Spill Prevention Control and Countermeasures (SPCC) regulations. This final rule is part of EPA's multi-phased strategy to address concerns with the SPCC regulation. Specifically, this SPCC rule amendment extends the dates by which the owner or operator of an SPCC regulated facility or farm must prepare or amend and implement an SPCC plan to November 10, 2010.

These amendments do not remove any regulatory requirement for owners or operators of facilities in operation before August 16, 2002, to maintain and implement SPCC plans in accordance with the SPCC regulations then in effect. Such facilities are required to maintain their plans until the applicable date for revising and implementing their plans under the new amendments.

More information:

http://www.epa.gov/oem/content/spcc/index.htm